## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TENNESSEE EASTERN DIVISION

IN RE: DEBORAH LAUNICE PUGH

CHAPTER 13

CASE NO. 11-11921

DEBTOR(S)

## MOTION FILED BY DEBTOR FOR AUTHORIZATION TO SELL PERSONAL PROPERTY

Come now the Debtor, by and through the attorney of record, C. Jerome Teel, Jr., and move the Court for an Order authorizing the sale of certain personal property.

The Debtor would show unto the Court as follows:

- The Debtor filed for relief under Chapter 13 of the Bankruptcy Code on May 30, 2011.
- 2. The Debtor wishes to sell her interest in her annuity to Peach Tree to pay off post petition medical bills.
- 3. The Debtor is selling the annuity for \$3,654.77. The Debtor has sent a use of funds to the Trustee.

## DEBTOR(S) MOVE(S):

- a. for service of process on all appropriate parties;
- b. for setting a hearing at the earliest convenience of the Court;
- c. for a court order allowing the Debtor to sell her interest in the annuity to Peach Tree for \$3,654.77;
- d. for plan payments to be reduced accordingly.

Respectfully submitted this 28th day of January, 2014.

TEEL & MARONEY, P.L.C.

/s/ C. Jerome Teel, Jr. C. Jerome Teel, Jr. (#016310) 425 E. Baltimore Street Jackson, TN 38301 (731) 424-3315 Fax: (731) 424-3501

## CERTIFICATE OF SERVICE

I, C. Jerome Teel, Jr., Counsel for the Debtor, do hereby certify that a true and exact copy of the foregoing Motion for Authorization to Sell Personal Property has been mailed to the following: Chapter 13 Trustee, Tim Ivy; Deborah Pugh 25 Cedarbrook Place Jackson TN 38305; Peach Tree 3301 Quantum Blvd. Second Floor Boynton Beach Fl 33426 on this 28<sup>th</sup> day of January, 2014

/s/ C. Jerome Teel, Jr.
C. Jerome Teel, Jr.
<del></del>

(Wgk)